

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Munster Steel Co., Inc.
9505 Calumet Ave.
Munster, Indiana 46321**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-4292-00090	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 25, 2002 Expiration Date: March 25, 2007

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION B GENERAL

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
- B.23 Transfer of Ownership or Operation [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Opacity [326 IAC 5-1]
- C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

TABLE OF CONTENTS (Continued)

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-(3)(A)(iii)]
- C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Response Plan - Implementation, Preparation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.2 Emission Offset Minor Limit [326 IAC 2-3]
- D.1.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]
- D.1.4 VOC Requirements [326 IAC 8-7]
- D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Monitoring

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

D.1.11 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

D.2.6 Parametric Monitoring

D.2.7 Baghouse Inspections

D.2.8 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

Certification

Emergency Occurrence Report

Quarterly Report

Quarterly Report

Quarterly Deviation and Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary structural and miscellaneous steel fabricating plant.

Responsible Official:	Ronald Robbins
Source Address:	9505 Calumet Ave., Munster, Indiana 46321
Mailing Address:	9505 Calumet Ave., Munster, Indiana 46321
General Source Phone Number:	(219) 924-5198
SIC Code:	3441
County Location:	Lake
Source Location Status:	Nonattainment for SO ₂ and ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control;
- (b) One (1) welding/flame-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute; seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and one (1) propane flame-cutting station with a maximum cutting rate of 12 inches per minute;
- (c) One (1) wheelabrator shot-blaster, constructed in 1990, with a blast rate of 20,000 pounds per hour of steel shot, equipped with a dust collector to control particulate emissions; and
- (d) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967
Telephone Number: 1-888-209-8892, or
Telephone Number : 219-245-4870
Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) Incorporated as originally stated,
 - (2) Revised, or
 - (3) Deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the

Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred,

the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth shall be limited to less than five hundred ninety-six (596) tons per twelve (12) consecutive month period. This is equivalent to limiting the particulate emissions, both PM and PM₁₀, from the paint booth to less than one hundred forty-nine (149) tons per year.

This requirement and the requirement in Condition D.2.2 limit particulate emissions such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 are not applicable.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

The VOC content of the coatings, primers, thinners, and cleaners inputted to the paint booth shall be limited to less than twenty-four and five-tenths (24.5) tons per twelve (12) consecutive month period. This limit is structured such that when including the VOC emissions from combustion, the source total VOC emissions remain below twenty-five (25) tons per year. Therefore the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the paint booth shall be limited to 0.03 grain per dry standard cubic foot.

D.1.4 VOC Requirements [326 IAC 8-7]

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) applies to this source because the source is in Lake County and the coating facility at the source has the potential to emit greater than ten (10) tons per year of VOC. However, as specified in 326 IAC 8-7-2(b), no emissions standards or limitations exist because the paint booth would be subject to 326 IAC 8-2, but actual emissions are below the applicability levels of the rules. Certification, record keeping, and reporting requirements do apply to this source and they are listed in the Record Keeping and Reporting Requirements section of this permit.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), does not apply to this source because its actual emissions are below fifteen (15) pounds per day.

Any change or modification which may increase the actual emissions of VOC to above fifteen (15) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.5 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM, PM10 and VOC usage limits and/or the PM, PM10, and VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.5. (Assume PM and PM10 are equal).
 - (1) The amount and VOC and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and solids usage for each month; and

- (5) The weight of VOCs and particulates emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of monthly overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with 326 IAC 8-7-6, the source shall submit to the department a certification that the paint booth is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:
 - (1) The name and address of the source and the name and telephone number of the company representative.
 - (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.
 - (3) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).
 - (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
 - (5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) welding/flame-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute; seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and (1) propane flame-cutting station with a maximum cutting rate of 12 inches per minute;
- (c) One (1) wheelabrator shot-blaster, constructed in 1990, with a blast rate of 20,000 pounds per hour of steel shot, equipped with a dust collector to control particulate emissions; and
- (d) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the listed facilities shall be limited to 0.03 grain per dry standard cubic foot.

D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

Both PM and PM10 emissions, from the wheelabrator shall not exceed 0.1 ton per year each (0.023 lb/hr).

This requirement and the requirement in Condition D.1.1 limit particulate emissions (PM and PM10) such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 are not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Condition D.2.1 and D.2.2, the dust collector for PM control shall be in operation and control emissions from the wheelabrator shot-blaster at all times that the wheelabrator shot-blaster is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of the wheelabrator stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the wheelabrator shot-blaster, at least once per shift when the wheelabrator shot-blaster is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure drop shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wheelabrator when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the

Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Implementation, Preparation, Records, and Reports, shall be considered a violation of this permit.

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of once per shift visible emission notations of the wheelabrator shot-blaster stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the inlet and outlet pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090
Facility: Paint Booth
Parameter: Solids content
Limit: The source shall limit the solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than five hundred ninety-six (596) tons per twelve (12) consecutive month period. This is equivalent to limiting the particulate emissions from the paint booth to less than one hundred forty-nine (149) tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090
Facility: Paint Booth
Parameter: VOC content
Limit: The source shall limit the VOC content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than twenty-four and five-tenths (24.5) tons per twelve (12) consecutive month period. This is equivalent to limiting source wide VOC emissions to less than twenty-five (25) tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Munster Steel Co., Inc.
Source Address: 9505 Calumet Ave., Munster, Indiana 46321
Mailing Address: 9505 Calumet Ave., Munster, Indiana 46321
Part 70 Permit No.: T089-4292-00090

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Part 70 Permit

Source Background and Description

Source Name: Munster Steel Co., Inc.
Source Location: 9505 Calumet Avenue, Munster, IN 46321
County: Lake
SIC Code: 3441
Operation Permit No.: T089-4292-00090
Permit Reviewer: ERG/KC

On January 5, 2002 the Office of Air Quality (OAQ) had a notice published in the Gary Post Tribune in Merrillville and The Times in Munster, Indiana, stating that Munster Steel Co., Inc. had applied for a Part 70 Permit to operate a stationary steel plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

Updates 1 through 5 have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at <http://www.state.in.us/idem/air/rules/apcb/packets/index.html>. The rule revisions will be published in the February 1, 2002 Indiana Register which can be found on the internet at <http://www.IN.gov/legislative/register/index-25.html>.

1. Add the new rule cite to B.2 Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
 - (1) ~~If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
 - (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
 - (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
 - (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed because it conflicted with 40 CFR 70.6(a)(6).

~~**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. B.14 Prior Permits Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
 - (1) **incorporated as originally stated,**

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. In C.17 (c)(2) "administrative amendment" has been revised to "minor permit modification", because 326 IAC 2-7-11(a)(7) has been repealed. The title Compliance Monitoring Plan - Failure to Take Response Steps has been changed to Compliance Response Plan - Preparation, Implementation, Records, and Reports throughout the permit. This change in the title was made throughout the permit when ever the condition was mentioned.

C.17 Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

7. The word "a" was inadvertently left out of the first sentence in Condition A.1. This error was corrected.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates ~~a~~ stationary structural and miscellaneous steel fabricating plant.

8. The wrong telephone number was supplied in Condition A.1. The wrong facility number was replaced with the correct one.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary structural and miscellaneous steel fabricating plant.

General Source Phone Number: (219)663-1920 **(219)924-5198**

9. A missing comma was inserted in the description of the paint booth.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control;

10. The incorrect telephone and facsimile numbers for the Northwest Regional Office were placed in Condition B.12 (Emergency Provisions). This incorrect numbers were replaced with the correct numbers.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: ~~1-800-753-5549~~ **1-888-209-8892**, or

Telephone Number : 219-245-4870

Facsimile Number: ~~219-245-4877~~ **219-881-6745**

11. Condition D.1.9 (Monitoring) references the presence of overspray on the rooftops. However, there are not exhausts on the rooftops. Therefore the reference to overspray on the rooftops was removed from the condition.

D.1.9 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions and the presence of overspray on ~~the rooftops~~ and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

12. A reporting requirement was inadvertently placed in Condition D.1.10 (Record Keeping Requirements). This error was corrected. Additionally a record keeping requirement was changed to match the monitoring requirement.

D.1.10 Record Keeping Requirements

- ~~(b) To document compliance with 326 IAC 8-7-6, the source shall submit to the department a certification that the paint booth is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:~~
- ~~(1) The name and address of the source and the name and telephone number of the company representative.~~
 - ~~(2) identification of each VOC emitting facility together with a description of the purpose each facility serves.~~
 - ~~(3) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).~~
 - ~~(4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:~~
 - ~~(A) Maximum design rate, maximum production, or maximum throughput.~~
 - ~~(B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.~~
 - ~~(5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.~~
- (e b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of ~~weekly~~ **monthly** overspray observations and those additional inspections prescribed by the Preventive Maintenance Plan.
- (~~d~~ c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a)** A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b)** **To document compliance with 326 IAC 8-7-6, the source shall submit to the department a certification that the paint booth is exempt from the requirements of 326 IAC 8-7-3. The certification shall contain all of the following information:**
- (1) The name and address of the source and the name and telephone number of the company representative.**
 - (2) Identification of each VOC emitting facility together with a description of the purpose each facility serves.**

- (3) A listing of facilities which meet the requirements of 326 IAC 8-7-2(a).
- (4) Baseline actual emissions for each facility identified in subdivision (3) together with the following information:
 - (A) Maximum design rate, maximum production, or maximum throughput.
 - (B) VOC emission factors with reference to the source of the emission factors and procedures as to how the emission factors were estimated, for example, the type of each fuel or process chemicals used and the baseline year used.
- (5) Procedures that will be used to monitor the source's potential emissions to ensure that they remain below twenty-five (25) tons per year.

13. Condition D.2.5 (Visible Emissions Notations) requires visible emissions notations of the sand blasting, wheelabrator, and welding/flame-cutting operation stack exhaust. However, the sand blasting and welding/flame-cutting operations do not have stacks. Therefore the requirement to perform visible emissions notations of the stack exhaust for these units was removed from the permit.

D.2.5 Visible Emissions Notations

- (a) Once per shift visible emission notations of the ~~sand blasting operation, wheelabrator, and welding/flame-cutting operation~~ stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of once per shift visible emission notations of the ~~sand blasting operation, wheelabrator shot-blaster, and welding/flame-cutting operation~~ stack exhaust.

14. The word "drop" was added to the following condition:

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the wheelabrator shot-blaster, at least once per shift when the wheelabrator shot-blaster is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - ~~Failure to Take Response Steps Preparation, Implementation, Records, and Reports~~. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - ~~Failure to Take Response Steps Preparation, Implementation, Records, and Reports~~, shall be considered a violation of this permit.

The instrument used for determining the pressure **drop** shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

15. 326 IAC 6-1-11.1 (Lake County Particulate Matter Contingency Measures) does not apply to this source because the source does not have the potential to emit greater than five (5) tons per year of fugitive particulate matter into the atmosphere. However, it was inadvertently placed in Section C. This error was corrected. Additionally, Condition C.23 was moved to become C.5.

~~C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]~~

~~Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:~~

- ~~(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).~~
- ~~(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).~~
- ~~(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).~~
- ~~(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.~~
- ~~(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.~~
- ~~(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.~~
- ~~(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).~~
- ~~(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.~~
- ~~(i) The PM_{10} emissions from building vents shall not exceed twenty two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.~~
- ~~(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).~~
- ~~(k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.~~

Contingency Measures

C.23 5 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Munster Steel Co., Inc.
Source Location: 9505 Calumet Ave., Munster, Indiana 46321
County: Lake
SIC Code: 3441
Operation Permit No.: T089-4292-00090
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Munster Steel Co., Inc. relating to the operation of a structural and miscellaneous steel fabricating plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) paint booth, coating structural steel, constructed in 1960, with a maximum capacity of 12.0 gallons of coating per hour, utilizing airless spray, with no control; and
- (b) One (1) welding/flame-cutting operation, constructed in 1972, consisting of three (3) submerged arc welding stations with a maximum capacity of 18 inches of wire per minute, four (4) metal inert gas welding stations with a maximum hourly capacity of 22 inches of wire per minute, seventeen (17) stick welding stations with a maximum of 40 electrodes per hour, and one (1) propane flame cutting station with a maximum cutting rate of 12 inches per minute.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (c) One (1) wheelabrator shot-blaster, constructed in 1990, with a blast rate of 20,000 pounds per hour of steel shot, equipped with a dust collector to control particulate emissions; and
- (d) One (1) blasting operation, originally constructed in 1970 using sand as the abrasive, modified in 1987 to use Black Beauty Grit, with a nozzle internal diameter of 0.5 inches and a nozzle pressure of 100 pounds per square inch, with a throughput of 2,044 pounds per hour, and no control.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) Seven (7) natural gas-fired furnaces, constructed in 1998, with a combined maximum capacity of 0.525 million British thermal units per hour; and
 - (2) Seventeen (17) natural gas-fired radiant heaters, constructed in 1985, with a combined maximum capacity of 1.632 million British thermal units per hour;
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons:
 - (1) One (1) gasoline storage tank, constructed in 1985, with a maximum storage capacity of 500 gallons and an annual throughput of 3,000 gallons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registered operation permit, issued on September 8, 1983; and
- (b) Operation permit 45-04-83-0300, issued on June 22, 1979.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on January 4, 1995.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	681.9
PM-10	632.8
SO ₂	0.0
VOC	399.3
CO	0.8
NO _x	0.9

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	109.59
Ethylbenzene	36.53
Toluene	79.61
MEK	59.92
Glycol Ethers	1.6
Manganese	0.25
Benzene	1.984x10 ⁻⁵
Dichlorobenzene	1.134x10 ⁻⁵
Formaldehyde	7.086x10 ⁻⁴
Hexane	1.701x10 ⁻²
Lead	4.724x10 ⁻⁶
Cadmium	1.039x10 ⁻⁵
Chromium	1.013x10 ⁻³
Nickel	1.984x10 ⁻⁵
TOTAL	287.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and VOC is equal to or greater than 100 tons per year and the potential to emit of VOC is equal to or greater than 25 tons per year and the source is located in Lake County. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	1
SO ₂	--
VOC	2
CO	--
NO _x	--
HAP (specify)	--

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Total HAPs
Paint Booth	Less than 149 (326 IAC 2-2)	Less than 149 (326 IAC 2-2)	0	Less than 24.5 (326 IAC 2-3)	0	0	Less than 25
Wheelabrator Shot-Blaster	0.01*	0.06*	0	0	0	0	0
Blasting with Black Beauty Grit	89.55**	89.55**	0	0	0	0	0
Welding/Flame Cutting	10.71**	10.71**	0	0	0	0	1.1**
Combustion	0.1**	0.1**	0**	0.1**	0.8**	0.9**	Neg.**
Total Emissions	Less than 250	Less than 250	0	Less than 25	0.8	0.9	Less than 26

* Emissions after the baghouse that is required to be in operation in order to comply with 326 IAC 2-2

** Uncontrolled emissions calculated using emission factors

Note: Even though VOC emissions have been limited to less than 25 tons per year, the source is still subject to 326 IAC 2-7 (Part 70 Permit Program) because the PM10 emissions are greater than 100 tons per year.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
SO ₂	Primary Nonattainment
NO ₂	Attainment
Ozone	Severe Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.

Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) Lake County has been classified as nonattainment for SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment or unclassifiable for PM₁₀, NO₂, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) does not apply to the 500 gallon gasoline storage tank even though it was constructed in 1985 because its capacity is less than 40 cubic feet.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is in an attainment county for particulate matter and has the potential to emit greater than two hundred and fifty (250) tons per year of particulate matter. However, this source has chosen to limit PM and PM₁₀ emissions to less than two hundred and fifty (250) tons per year in order to become a minor source under Prevention of Significant Deterioration. The source will be in compliance with this limit by complying with the following requirements:

- (a) The dust collector for the wheelabrator shot blaster shall be in operation at all times that the wheelabrator is in operation. This is equivalent to limiting the particulate emissions, PM and PM₁₀, from the wheelabrator to less than 0.1 ton per year each (0.023 lb/hr).
- (b) The source shall limit the solids content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than five hundred ninety-six (596) tons per twelve (12)

consecutive month period. This is equivalent to limiting the PM and PM10 emissions from the paint booth to less than one hundred forty-nine (149) tons per year.

These requirements limit particulate (PM and PM10) emissions such that when including the particulate emissions from the other units at the source, the total source emissions remain below two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 are not applicable.

326 IAC 2-3 (Emission Offset)

This source has chosen to limit VOC emissions to less than twenty-five (25) tons per year. The source will be in compliance with this limit by limiting the VOC content of the coatings, primers, thinners, and cleaners inputted to the paint booth to less than twenty-four and five-tenths (24.5) tons per twelve (12) consecutive month period. This limit is structured such that when including the VOC emissions from combustion, the source total VOC emissions remain below twenty-five (25) tons per year. Therefore the source will be considered a minor source under 326 IAC 2-3 (Emission Offset).

326 IAC 2-4.1-1 (New Sources of Hazardous Air Pollutants)

326 IAC 2-4.1-1 (New Sources of Hazardous Air Pollutants) does not apply to this source because the units were constructed prior to July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is in Lake County and has the potential to emit more than ten (10) tons per year of VOC. The source also has the potential to emit greater than one hundred (100) tons per year of PM10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

326 IAC 5-1-2 (Opacity Limitations) applies to this source because the source is in Lake County in an area bounded on the north by Lake Michigan, on the west by the Indiana-Illinois state line, on the south by U.S. 30 from the state line to the intersection of I-65 to the intersection of I-94 then following I-94 to the Lake-Porter County line, and on the east by the Lake-Porter County line. Pursuant to this rule, except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Emission Limitations)

326 IAC 6-1-2 (Particulate Emission Limitations) applies to this source because this source is located in Lake county which is listed in section 7 of this rule, this source is not specifically listed in section 10, and the source has the potential to emit greater than one hundred (100) tons per year of particulate matter. Pursuant to this rule, the discharge of any gases from the paint booth, the welding/flame-cutting operation, the wheelabrator shot-blast, and the blasting operation which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.3 grain per dry standard cubic foot (dscf)) shall not be allowed.

326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements)

326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements) does not apply to this source even though it is in Lake County because Munster Steel is not specifically listed in this section.

326 IAC 6-1-10.2 (Lake County PM10 Coke Battery Emission Requirements)

326 IAC 6-1-10.2 (Lake County PM10 Coke Battery Emission Requirements) does not apply to this source even though it is in Lake County because there is no coke battery at the site.

326 IAC 6-1-11.1 (Lake County Particulate Matter Contingency Measures)

326 IAC 6-1-11.1 (Lake County Particulate Matter Contingency Measures) does not apply to this source because the source does not have the potential to emit greater than five (5) tons per year of fugitive particulate matter into the atmosphere.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures) applies to this source because it has the potential to emit greater than ten (10) tons per year of PM10.

326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations)

326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations) does not apply to this source because the source does not have the potential to emit greater than twenty-five (25) tons per year of SO₂ and therefore is not subject to 326 IAC 7-1.1. Additionally, no facilities at the source burn fossil fuels.

State Rule Applicability - Paint Booth

326 IAC 6-1-2 (Particulate Emission Limitations)

326 IAC 6-1-2 (Particulate Emission Limitations) applies to this source because it is located in Lake County which is listed in Section 7 of this rule, this source is not specifically listed in Section 10, and the source has the potential to emit greater than one hundred (100) tons per year of particulate matter. Pursuant to this rule, the discharge of any gases from the paint booth which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.3 grain per dry standard cubic foot (dscf)) shall not be allowed.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to this source because it was constructed prior to January 1, 1980 and has limited VOC emissions to less than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

326 IAC 8-2-9 (Miscellaneous Metal Coating) does not apply to this source even though it is located in Lake County and was constructed prior to January 1, 1980 because it is limiting VOC emissions to less than twenty-five (25) tons per year which is less than the applicability of one hundred (100) tons per year. Additionally, this rule is not applicable to this source because its actual emissions are less than fifteen (15) pounds of VOC per day.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) does not apply to this source even though this source is in Lake County and was constructed prior to January 1, 1980 because it is limiting its potential to emit of VOC to less than twenty-five (25) tons per year which is less than the one hundred (100) ton per year applicability level.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) applies to this source because the source is in Lake County and the coating facility at the source has the potential to emit greater than ten (10) tons per year of VOC. However, as specified in 326 IAC 8-7-2(b), no emissions standards or limitations exist because the paint booth would be

subject to 326 IAC 8-2, but actual emissions are below the applicability levels of the rules. Certification, record keeping, and reporting requirements do apply to this source.

Testing Requirements

There is no evidence that the source is out of compliance with applicable rules. Additionally, record keeping is required for the VOC and solids input to the paint booth. This information is complete enough to ensure compliance with 326 2-2 and 326 IAC 2-3. Testing would not provide any additional information.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The wheelabrator shot-blaster, welding/flame cutting operations, and blasting operations have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the wheelabrator shot-blaster, welding/flame cutting operation, and blasting operation exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan-Failure to Take Response Steps shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the dust collector controlling the wheelabrator shot-blaster, at least once per shift when the wheelabrator shot-blaster is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 to 6.0 inches of water or a range established during the latest stack test the Permittee

shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Failure to Take Response Steps.

- (c) An inspection shall be performed each calender quarter of all bags controlling the wheelabrator when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

2. The paint booth has applicable compliance monitoring conditions as specified below:

- (a) Monthly inspections shall be performed of the coating emissions and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

These monitoring conditions are necessary because the baghouse for the wheelabrator shot-blaster must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this structural and miscellaneous steel fabricating plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T089-4292-00090.

Appendix A: Emissions Calculations

Page 1 of 7 TSD App A

Welding - Flame Cutting

Company Name: Munster Steel
Address City IN Zip: 9505 Calumet Ave., Munster, IN 46321
Permit Number: T089-4292-00090
Plt ID: 089-00090
Reviewer: ERG/KC
Date: #####

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
WELDING			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
Submerged Arc	3	5	0.036	0.011			0.540	0.165	0.000		0.165	
Metal Inert Gas (MIG)(carbon steel)	4	5	0.0241	0.000034			0.482	0.001	0.000		0.001	
Stick (E7018 electrode)	17	5	0.0211	0.0009			1.794	0.077	0.000		0.077	
Tungsten Inert Gas (TIG)(carbon steel)			0.0055	0.0005			0.000	0.000	0.000		0.000	
Oxyacetylene(carbon steel)			0.0055	0.0005			0.000	0.000	0.000		0.000	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**			EMISSIONS (lbs/hr)			HAPS (lbs/hr)		
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn		Ni	Cr
Propane	1	3	12	0.1622	0.0005	0.0001	0.0003	0.350	0.001	0.000	0.001	0.002
EMISSION TOTALS												
Potential Emissions lbs/hr								3.17				0.24
Potential Emissions lbs/day								75.98				5.86
Potential Emissions tons/year								13.87				1.07

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations

Page 2 of 7 TSD App A

Black Beauty Grit Blasting

Company Name: Munster Steel
Address City IN Zip: 9505 Calumet Ave., Munster, IN 46321
Permit Number: T089-4292-00090
Plt ID: 089-00090
Reviewer: ERG/KC
Date: 08/01/2001

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diam	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

1265
160
99
0.5
0.5

Flow Rate (FR) (lb/hr) = 2044.444 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.010
2044.444
0 %
1

Uncontrolled Emissions	20.44 lb/hr
	89.55 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

$\text{Ton/yr} = \text{lb/hr} \times 8760 \text{ hr/yr} \times \text{ton/2000 lbs}$

$\text{Flow Rate (FR) (lb/hr)} = \text{FR1} \times (\text{ID}/\text{ID1})^2 \times (\text{D}/\text{D1})$

$E = \text{EF} \times \text{FR} \times (1 - w/200) \times N$

w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emissions Calculations

Page 3 of 7 TSD App A

Wheelabrator

Company Name: Munster Steel
Address City IN Zip: 9505 Calumet Ave., Munster, IN 46321
Permit Number: T089-4292-00090
Plt ID: 089-00090
Reviewer: ERG/KC
Date: 08/01/2001

Sand emission factors: PM 0.004 lb/lb abrasive
 PM10 0.00344 lb/1000 lb abrasive

Uncontrolled PM emissions: = (0.004lb/lb abrasive) * (20000 lb abrasive/hr) * (8760 hr/yr) * (ton/2000 lb)
 = 350.4 ton/yr

Uncontrolled PM10 emissions: = (0.00344lb/lb abrasive) * (20000 lb abrasive/hr) * (8760 hr/yr) * (ton/2000 lb)
 = 301.3 ton/yr

Baghouse Control Efficiency: 99.995 %

Controlled PM Emissions: = (350.4 ton/yr) * (1 - .99995)
 = 0.02 ton/yr

Controlled PM10 Emissions: = (301.3 ton/yr) * (1 - .99995)
 = 0.02 ton/yr

Appendix A: Emissions Calculations

HAP Emissions

Surface Coating Activities

Company Name: Munster Steel

Address City IN Zip: 9505 Calumet Ave., Munster, IN 46321

Permit Number: T089-4292-00090

Plt ID: 089-00090

Reviewer: ERG/KC

Date: 08/01/2001

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Toluene	Weight % MEK	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Sherwin Wms Red Primer B50RW3	13.3	6.00000	2	14.00%	2.00%	0.00%	0.00%	0.00%	97.57	13.94	0.00
Carboline Buff Primer 818	13.9	6.000000	2	15.00%	5.00%	0.00%	0.00%	0.00%	109.59	36.53	0.00
Zinc Primer Carbo Z 11	21.6	6.000000	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner #2	7.1	1.600000	2	0.00%	0.00%	80.00%	25.00%	0.00%	0.00	0.00	79.61
Carbozinc HS Activator	7.8	6.000000	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner 214	6.8	0.160000	2	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00
Thinner 25	7.4	0.160000	2	40.00%	10.00%	0.00%	0.00%	0.00%	4.15	1.04	0.00
Thinner 21	6.5	0.160000	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner 10	7.2	0.160000	2	80.00%	20.00%	0.00%	0.00%	0.00%	8.07	2.02	0.00
Carbothane PtA 134 HS	11.4	6.000000	2	5.00%	0.00%	0.00%	10.00%	0.00%	29.96	0.00	0.00
Urethane Converter 900	9.3	6.000000	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
D-Limonene 5989-27-5	7.0	0.160000	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner 26	7.6	0.160000	2	0.00%	0.00%	0.00%	0.00%	15.00%	0.00	0.00	0.00

Total State Potential Emissions

109.59

36.53

79.61

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

MEK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
0.00	0.00
0.00	0.00
0.00	0.00
24.88	0.00
0.00	0.00
9.53	0.00
0.00	0.00
0.00	0.00
0.00	0.00
59.92	0.00
0.00	0.00
0.00	0.00
0.00	1.60

59.92 1.60

Appendix A: Emissions Calculations
VOC Emissions
Surface Coating Activities
Company Name: Munster Steel
Address City IN Zip: 9505 Calumet Ave., Munster, IN 46321
Permit Number: T089-4292-00090
Plt ID: 089-00090
Reviewer: ERG/KC
Date: #####

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Sherwin Wms Red Primer B50RW3	13.3	38.00%	0.0%	38.0%	0.0%	54.00%	6.00000	2.000	5.04	5.04	60.47	1451.17	264.84	108.03
Carboline Buff Primer 818	13.9	20.00%	0.0%	20.0%	0.0%	70.00%	6.00000	2.000	2.78	2.78	33.36	800.64	146.12	146.12
Zinc Primer Carbo Z 11	21.6	19.27%	0.0%	19.3%	0.0%	35.23%	6.00000	2.000	4.17	4.17	50.04	1200.97	219.18	229.56
Thinner #2	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	1.60000	2.000	7.10	7.10	22.72	545.28	99.51	0.00
Carbozinc HS Activator	7.8	95.00%	0.0%	95.0%	0.0%	5.00%	6.00000	2.000	7.41	7.41	88.92	2134.08	389.47	5.12
Thinner 214	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	6.80	6.80	2.18	52.22	9.53	0.00
Thinner 25	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	7.40	7.40	2.37	56.83	10.37	0.00
Thinner 21	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	6.50	6.50	2.08	49.92	9.11	0.00
Thinner 10	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	7.20	7.20	2.30	55.30	10.09	0.00
Carbothane PTA 134 HS	11.4	23.00%	0.0%	23.0%	0.0%	45.00%	6.00000	2.000	2.62	2.62	31.46	755.14	137.81	115.34
Urethane Converter 900	9.3	10.00%	0.0%	10.0%	0.0%	90.00%	6.00000	2.000	0.93	0.93	11.16	267.84	48.88	109.98
D-Limonene 5989-27-5	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	7.00	7.00	2.24	53.76	9.81	0.00
Thinner 26	7.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.16000	2.000	7.60	7.60	2.43	58.37	10.65	0.00

State Potential Emissions
METHODOLOGY

Worst Case Coating Plus Cleaner

399.28 229.56

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used